April 22, 1992

Robert Brobst 8WM-C
U.S. EPA
999 18th Street, Suite 500
Denver, CO 80202-2405

Re: Letter of Beneficial Use
Pioneer Oil & Gas (JBC 4/15/92)

Dear Mr. Brobst:

The Shoshone and Arapaho Tribes of the Wind River Indian Reservation, Wyoming are hereby submitting a "Letter of Beneficial Use", on behalf of ARCO Oil and Gas Company renewals for National Pollutant Discharge Elimination System Permits (NPDES), WY-0025607, 0034339, 0003042, requesting that the discharge continue in accordance with the State regulations.

We are basing our request on the issue that the produced water discharge provides significant benefits to the area. These benefits include providing moisture to an extremely arid area as well as a source of water supply for not only stock cattle which occupy the area, but indigenous wildlife including Pronghorn Antelope, local birds and rodents. In addition, this water discharge has also effectively increased the surface value of this particular area by encouraging leasing and use. Therefore we steadfastly contend that the surface discharge of fresh water from the wells benefits the Tribes, the community, and the area wildlife. Even though, we do take this position in requesting that ARCO be awarded the permits, we would like to have ARCO meet the EPA and State requirements by the time the permits are up for renewal again. This would eliminate the need for land owners to issue a "Letter of Beneficial Use."

If we can be of further assistance, please call at 307-332-6625. Thank you for consideration on this matter.

Sincerely,

Ben Snyder, Sr., Co-Chairman
Shoshone Business Council

for Burton Hutchinson, Chairman
Arapaho Business Council

cc: Pioneer Oil & Gas

Business

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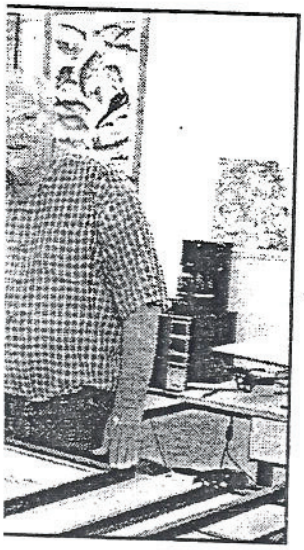

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Herds at risk of sulfate-induced polio

Disease caused by drinking brackish water is 95 percent fatal

Several cases of sulfate-induced polio have been identified in Wyoming cattle herds this summer. Although there are many causes and type of polio, the most probable cause in this case is high sulfur intake.

Because Wyoming is experiencing a drought and ponds are drying up, the water available to animals is more concentrated and salty. Sulfate is part of the salt. "Two thousand five hundred parts per million sulfate ion is the amount of sulfur in water that may cause this type of polio," said Merl Raisbeck, professor and toxicologist in the UW College of Agriculture Department of Veterinary Sciences.

In many parts of the country, polio in cattle is caused by a thiamin deficiency and can be treated. Unfortunately in Wyoming, that's not usually the case. Although sulfate-induced polio is not infectious, 95 percent of the time it is a fatal poisoning. "Many producers don't realize the hazard associated with high-sulfate water, and they assume the animals will just lose weight," Raisbeck said. "In reality, they're going to lose the entire animal."

Signs of sulfate-induced polio are obvious. Initially, the animal will go off feed and be lethargic for a few hours or a day or so. Facial muscles and ears may twitch. Because polio affects the central nervous system, the animal will walk with a wobbling, staggering gait and may become blind. Due to the onset of blindness, the animal often attempts to walk through objects or stands in a corner and presses its head against the wall. During the laststages of the illness, the animal will begin convulsing.

> "Many producers don't realize the hazard associated with high-sulfate water, and they assume the animals will just lose weight.."
>
> — *Merl Raisbeck*

"Local veterinarians can confirm polio," Raisbeck said. "But this year, those signs combined with brackish water lead to a pretty straightforward diagnosis."

Concerned producers should test sulfur levels in their water supplies.

Dipstick test kits are available through lab supply stores, or water samples can be sent to the Wyoming State Vet Lab in Laramie.

"If your test results show high levels of sulfur, there are only three things you can do," Raisbeck explained. "You can move the cattle to an area with a cleaner water supply, truck water into the pasture to dilute the existing pond or accept the losses this year."

For more information about sulfate-induced polio or water testing, contact Raisbeck by phone at (307) 742-6638 or by e-mail at raisbeck@uwyo.edu.

IRS e-file seminars announced for WY

The Internal Revenue Service electronic filing coordinator will be hosting a free electronic filing seminar in Casper at the Oil and Gas Conservation Building on Wednesday, Aug. 23, 1-4 p.m. and in Cheyenne Aug. 24, 1-4 p.m. at the BLM building.

The tax professional community and those interested in offering IRS e-file are invited to attend.

Continuing Professional Education credits are available for attendance, and both new and experienced electronic filers will benefit. Topics include the application process, changes, [illegible] information on federal and state e-file programs.

In the 2000 filing season, over 35 million federal income tax returns and 12 million state returns were electronically filed by paid preparers, taxpayers using a home computer and by telephone.

Congress, by enacting the IRS Restructuring and Reform Act of 1998, has mandated that 80 percent of federal income tax returns by filed electronically by 2007.

Electronic filing offers an acknowledged receipt the return increased accuracy due to computer validation, acceptance of refund and balance due returns, the ability to electronically file both federal and state returns, simultaneously and allows taxpayers to make electronic payments.

To register, submit your name, company name, address, telephone number, date and location of the seminar you wish to attend, and if you are currently an Electronic Return Originator to: Virginia Sonntag at 307-633-0803. You may fax the information to (307) 633-0915

STATEMENT OF BASIS

PERMIT AMENDMENT #1

APPLICANT NAME:	Pioneer Oil & Gas
CONTACT PERSON:	Greg Colton (801) 566-3000
MAILING ADDRESS:	6925 Union Park Center, Suite 145 Midvale, UT 84047
FACILITY LOCATION:	NW Sheldon Dome, NW1/4, Section 01, Township 05 North, Range 03 West, Fremont County
PERMIT NUMBER:	WY-0025607

Amendment #1 revises the NPDES permit issued on July 1, 1991 for discharges from an oil and/or gas production unit wastewater treatment facility. This amendment grants the permit modification requests submitted to EPA on January 21, 1992. The letter requested the deletion of effluent limits for total dissolved solids, chlorides and sulfates for permits WY-0025607 and WY-0003042. In addition to the requested changes, a quarterly visual monitoring requirement has been added for floating solids and foam.

The revisions are granted under the grandfather provisions of the Wyoming rules for Surface Discharge of Water Associated with the Production of Oil and Gas, Chapter VII, Section 5.a.(1). The exemption applies to discharges in existence prior to August 1978 which are being used beneficially for irrigation, stock watering, fish or wildlife, etc. Beneficial use was documented in the April 22, 1992 letter from the Shoshone and Arapahoe Tribes. The Tribes will reevaluate the beneficial use designation when the permits are renewed.

Revised by:
Dana B. Allen
Dana B. Allen, P.E.
EPA, Region VIII
16 July 1992

Appendix C

Lander, WY 82520

Macroinvertebrate I.D. Bench Sheet

Client Name WREQC Sample Site Winkleman Dome site 1
Sample I.D. W1-07/08/05 Date Sample taken 07/08/05
Subsample # Qualitative - picked for 15 min.
I.D. Date 08/04/05 Individuals Picked Qualitative
I.D. by AHS. Large/Rare Enclosed? Yes (No) (Circle One)
Number of Taxa & pages used in this bench I.D. (Include Large/Rare) _____

1. Taxon I.D. No Aquatics & terrestrials only.	
_____ Number in Subsample _____ Client Voucher Collection _____ WBCI Voucher Collection _____ Total Subsample # _____ Sub Multiplier _____ Total Sample	Number in Subsample
2. Taxon I.D.	
_____ Number in Subsample _____ Client Voucher Collection _____ WBCI Voucher Collection _____ Total Subsample # _____ Sub Multiplier _____ Total Sample	Number in Subsample
3. Taxon I.D.	
_____ Number in Subsample _____ Client Voucher Collection _____ WBCI Voucher Collection _____ Total Subsample # _____ Sub Multiplier _____ Total Sample	Number in Subsample
4. Taxon I.D.	
_____ Number in Subsample _____ Client Voucher Collection _____ WBCI Voucher Collection _____ Total Subsample # _____ Sub Multiplier _____ Total Sample	Number in Subsample
5. Taxon I.D.	
_____ Number in Subsample _____ Client Voucher Collection _____ WBCI Voucher Collection _____ Total Subsample # _____ Sub Multiplier _____ Total Sample	Number in Subsample
6. Taxon I.D.	
_____ Number in Subsample _____ Client Voucher Collection _____ WBCI Voucher Collection _____ Total Subsample # _____ Sub Multiplier _____ Total Sample	Number in Subsample
7. Taxon I.D.	
_____ Number in Subsample _____ Client Voucher Collection _____ WBCI Voucher Collection _____ Total Subsample # _____ Sub Multiplier _____ Total Sample	Number in Subsample

Sample Visit W1-07/08/05

Water Bear Consulting
995 Diane Ct.
Lander, WY 82520

307 335-9855
cshoutis@wyoming.com

Macroinvertebrate I.D. Bench Sheet

Client Name WREQC Sample Site Wilderness Dome Site 2 (Below dead duck pond)
Sample I.D. W2-07/08/05 Date Sample taken 07/08/05
Subsample # Qualitative - picked for 15 min.

I.D. Date 07/08/05 Individuals Picked _____
I.D. by AHS Large/Rare Enclosed? Yes (No) (Circle One)
Number of Taxa & pages used in this bench I.D. (Include Large/Rare) _____

	Number in Subsample	Number in Subsample
1. Taxon I.D. Eristalis ~~tenax~~ ~~sp.~~ tenax (pupa)		
	_____ Client Voucher Collection	
	1 WBCI Voucher Collection (pupa)	1 pupa
	_____ Total Subsample #	
	_____ Sub Multiplier	
	1 Total Sample	
2. Taxon I.D. Ephydra sp. 1 L, P		
	_____ Client Voucher Collection	
	2 WBCI Voucher Collection	1 L
	_____ Total Subsample #	+ 1 puparium
	_____ Sub Multiplier	
	2 Total Sample	
3. Taxon I.D. Ceratopogonidae pupa exuvia.		
	_____ Client Voucher Collection	
	1 WBCI Voucher Collection	1
	_____ Total Subsample #	
	_____ Sub Multiplier	
	1 Total Sample	
4. Taxon I.D. Culex ~~territans~~ pipiens? L		
	_____ Client Voucher Collection	
	1 WBCI Voucher Collection	1
	_____ Total Subsample #	
	_____ Sub Multiplier	
	_____ Total Sample	
5. Taxon I.D. Limnodrilus hoffmeisteri		
	_____ Client Voucher Collection	
	1 WBCI Voucher Collection LS	
	_____ Total Subsample #	
	_____ Sub Multiplier	
	1 Total Sample	
6. Taxon I.D.		
	_____ Number in Subsample	
	_____ Client Voucher Collection	
	_____ WBCI Voucher Collection	
	_____ Total Subsample #	
	_____ Sub Multiplier	
	_____ Total Sample	
7. Taxon I.D.		
	_____ Number in Subsample	
	_____ Client Voucher Collection	
	_____ WBCI Voucher Collection	
	_____ Total Subsample #	
	_____ Sub Multiplier	
	_____ Total Sample	

Sample Visit W2-07/08/05

Qualitative Macroinvertebrate Report

Visit: W2-07/08/05

Site Winkleman above ca *7/8/2005*

Water BearConsultingInc. (307) 335-9855
995 Diane Court
cshoutis@wyoming.com

Class / Order / Family	Species id	Qualitative Count	Stage
Insecta	Total Individuals = 5.0	Pct. of all indiv. = 83.33%	
Diptera	Total Individuals = 5.0	Pct. of all indiv. = 83.33%	
Ceratopogonidae	Total Individuals = 1.0	Pct. of all indiv. = 16.67%	
	Ceratopogonidae UNID	1.0	Px
Culicidae	Total Individuals = 1.0	Pct. of all indiv. = 16.67%	
	Culex pipiens	1.0	L
Ephydridae	Total Individuals = 2.0	Pct. of all indiv. = 33.33%	
	Ephydra sp. 1	2.0	L,p
Syrphidae	Total Individuals = 1.0	Pct. of all indiv. = 16.67%	
	Eristalis tenax	1.0	P
Oligochaeta	Total Individuals = 1.0	Pct. of all indiv. = 16.67%	
Plesiopora	Total Individuals = 1.0	Pct. of all indiv. = 16.67%	
Tubificidae	Total Individuals = 1.0	Pct. of all indiv. = 16.67%	
	Limnodrilus hoffmeisterii	1.0	A

Grand Total Individuals= 6.0

Water Bear Consulting
995 Diane Ct.
Lander, WY 82520

307 335-9855
cshoutis@wyoming.com

Macroinvertebrate I.D. Bench Sheet

Client Name WRFQC Sample Site Site 3 Winkleman Dome in cattails
Sample I.D. W3-07/08/05 Date Sample taken
Subsample # Qualitative sample;

I.D. Date Aug 1 05 Individuals Picked
I.D. by AHS Large/Rare Enclosed? Yes (No) (Circle One)
Number of Taxa & pages used in this bench I.D. (Include Large/Rare)

* **1. Taxon I.D.** Argia plana N's late / med.

Number in Subsample	Number in Subsample
Client Voucher Collection	3
3 WBCI Voucher Collection 3	
Total Subsample #	
Sub Multiplier	
3 Total Sample	

2. Taxon I.D. Hyalella azteca

5 Number in Subsample	Number in Subsample
Client Voucher Collection	4 + 1
WBCI Voucher Collection	
Total Subsample #	
Sub Multiplier	
5 Total Sample	

3. Taxon I.D. Caenis youngi N*

1 Number in Subsample	Number in Subsample
Client Voucher Collection	1
WBCI Voucher Collection	
Total Subsample #	
Sub Multiplier	
1 Total Sample	

4. Taxon I.D. Physa utahensis

14 Number in Subsample	Number in Subsample
Client Voucher Collection	14
WBCI Voucher Collection	
Total Subsample #	
Sub Multiplier	
14 Total Sample	

* **5. Taxon I.D.** Simulium jacumbae L's med/late.

4 Number in Subsample	Number in Subsample
Client Voucher Collection	3 + 1
6 WBCI Voucher Collection 6	
Total Subsample #	
Sub Multiplier	
10 Total Sample	

6. Taxon I.D. Bezzia / Palpomyia sp 1 L late

1 Number in Subsample	Number in Subsample
Client Voucher Collection	1
WBCI Voucher Collection	
Total Subsample #	
Sub Multiplier	
1 Total Sample	

7. Taxon I.D. Cricotopus sp. 632 L late.

Number in Subsample	Number in Subsample
Client Voucher Collection	
1 WBCI Voucher Collection 1	
Total Subsample #	
Sub Multiplier	
1 Total Sample	

Sample Visit W3-07/08/05

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995 Diane Ct.
Lander, WY 82520

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8. Taxon I.D.	Agabus sp. 1 L med/lrg	
_____ Number in Subsample Jar _____ Client Voucher Collection 1 WBCI Voucher Collection 1 _____ Total Subsample # 1 Sub Multiplier _____ Total Sample		Number in Subsample
9. Taxon I.D.	Lebertia sp 1 ?	
_____ Number in Subsample Jar _____ Client Voucher Collection _____ WBCI Voucher Collection 1 1 Total Subsample # _____ Sub Multiplier 1 Total Sample		Number in Subsample
10. Taxon I.D.	Orthocladius sp. 8 L's med	
5 Number in Subsample Jar _____ Client Voucher Collection _____ WBCI Voucher Collection _____ Total Subsample # 5 Sub Multiplier _____ Total Sample		Number in Subsample 2 + 3
11. Taxon I.D.	Paratanytarsus sp. 6 11 L med.	
8 Number in Subsample Jar _____ Client Voucher Collection _____ WBCI Voucher Collection _____ Total Subsample # _____ Sub Multiplier 8 Total Sample		Number in Subsample 2+3+1+1+1
12. Taxon I.D.	~~Hydrobia sacrata~~ ?; Nais communis	
_____ Number in Subsample Jar _____ Client Voucher Collection 1 WBCI Voucher Collection 15 _____ Total Subsample # _____ Sub Multiplier 1 Total Sample		Number in Subsample
13. Taxon I.D.	Parametriocnemus lundbecki L Med.	
1 Number in Subsample Jar _____ Client Voucher Collection _____ WBCI Voucher Collection _____ Total Subsample # _____ Sub Multiplier 1 Total Sample		Number in Subsample 1
14. Taxon I.D.	Tubifex tubifex	
_____ Number in Subsample Jar _____ Client Voucher Collection 1 WBCI Voucher Collection 15 _____ Total Subsample # _____ Sub Multiplier 1 Total Sample		Number in Subsample
15. Taxon I.D.		
_____ Number in Subsample Jar _____ Client Voucher Collection _____ WBCI Voucher Collection _____ Total Subsample # _____ Sub Multiplier _____ Total Sample		Number in Subsample

Sample Visit WJ-07/08/05

Qualitative Macroinvertebrate Report

Visit: W3-07/08/05

Site Winkleman Dome in 7/8/2005

Water BearConsultingInc. (307) 335-9855
995 Diane Court
cshoutis@wyoming.com

Class / Order / Family	Species id		Qualitative Count	Stage
Chelicerata	Total Individuals =	1.0	Pct. of all indiv. =	1.89%
Acarina	Total Individuals =	1.0	Pct. of all indiv. =	1.89%
Lebertiidae	Total Individuals =	1.0	Pct. of all indiv. =	1.89%
	Lebertia sp. 1		1.0	A
Crustacea	Total Individuals =	5.0	Pct. of all indiv. =	9.43%
Amphipoda	Total Individuals =	5.0	Pct. of all indiv. =	9.43%
Talitridae	Total Individuals =	5.0	Pct. of all indiv. =	9.43%
	Hyalella azteca		5.0	A
Gastropoda	Total Individuals =	14.0	Pct. of all indiv. =	26.42%
Pulmonata	Total Individuals =	14.0	Pct. of all indiv. =	26.42%
Physidae	Total Individuals =	14.0	Pct. of all indiv. =	26.42%
	Physella utahensis		14.0	A
Insecta	Total Individuals =	31.0	Pct. of all indiv. =	58.49%
Coleoptera	Total Individuals =	1.0	Pct. of all indiv. =	1.89%
Dytiscidae	Total Individuals =	1.0	Pct. of all indiv. =	1.89%
	Agabus sp. 1		1.0	L
Diptera	Total Individuals =	26.0	Pct. of all indiv. =	49.06%
Ceratopogonidae	Total Individuals =	1.0	Pct. of all indiv. =	1.89%
	Bezzia/Palpomyia sp. 1		1.0	L
Chironomidae	Total Individuals =	15.0	Pct. of all indiv. =	28.30%
	Cricotopus sp. 632		1.0	L
	Orthocladius sp. 86		5.0	L
	Parametriocnemus lundbeckii		1.0	L
	Paratanytarsus sp. 611		8.0	L
Simuliidae	Total Individuals =	10.0	Pct. of all indiv. =	18.87%
	Simulium (Simulium) jacubae		10.0	L
Ephemeroptera	Total Individuals =	1.0	Pct. of all indiv. =	1.89%
Caenidae	Total Individuals =	1.0	Pct. of all indiv. =	1.89%
	Caenis youngi		1.0	Nx
Odonata	Total Individuals =	3.0	Pct. of all indiv. =	5.66%
Coenagrionidae	Total Individuals =	3.0	Pct. of all indiv. =	5.66%
	Argia plana		3.0	N
Oligochaeta	Total Individuals =	2.0	Pct. of all indiv. =	3.77%